

## Direct Examination of C. Jackson

1 (9:48 a.m.)

2 **THE COURT:** Your witness, sir.

3 **MR. AUBIN:** Thank you, Your Honor.

4 **DIRECT EXAMINATION**

5 **BY MR. AUBIN:**

6 **Q.** Good morning.

7 **A.** Good morning.

8 **Q.** Mr. Jackson, are you familiar with the application  
9 Telegram?

10 **A.** Yes.

11 **Q.** What is Telegram?

12 **A.** It's an application for messaging whether in group or  
13 private messaging.

14 **Q.** Do you use Telegram yourself?

15 **A.** Yes.

16 **Q.** With respect to this case, did you use Telegram?

17 **A.** Yes.

18 **Q.** What did you use it for?

19 **A.** I communicated with people in both public and private  
20 chats as well as one-on-one communications.

21 **Q.** Did you do that on your own or was it in conjunction with  
22 any organizations?

23 **A.** No, I did it on behalf of the FBI as a confidential human  
24 source.

25 **Q.** All right. Now, as a confidential human source, does that

1 make you an employee of the FBI?

2 A. No.

3 Q. Can you describe the nature of your arrangement with the  
4 FBI?

5 A. I am essentially tasked to go into online spaces, whether  
6 it be on Telegram or in other places, to identify potentially  
7 illegal activity or those that would like to do violence.

8 Q. About how long have you worked with the FBI as a  
9 confidential human source?

10 A. Around four years.

11 THE COURT: Four years?

12 THE WITNESS: Yes, sir.

13 THE COURT: Thank you. Next question.

14 BY MR. AUBIN:

15 Q. In working on behalf of the FBI, did you ever receive  
16 payment?

17 A. Yes.

18 Q. Do you recall approximately how much money you have  
19 received in the last four years?

20 A. I've received approximately \$70,000. However, about  
21 40,000 of that was actual payment; 30,000 was reimbursements  
22 for various expenses that I've had in the course of this work.

23 Q. What type of expenses? What do they cover?

24 A. Keeping my phone plan active. Purchasing a separate phone  
25 for use in this. Apple store credit for various apps, if

1 needed, in the course of this. Plane tickets when needed to go  
2 to a meeting or something of that nature.

3 Q. Now, I want to direct you back to Telegram. Can you  
4 describe how you interact with other users on the app?

5 A. There are a couple of different ways that you can. There  
6 are channels which are one-way broadcast if you're -- the owner  
7 of that can push out a message or a picture or text. There are  
8 private chats or group chats that are smaller and are more  
9 interactive. You can talk back and forth. And then there are  
10 like I described before one-on-one communications, direct  
11 messages.

12 Q. All right. Now, with regard to channels, were you a  
13 member of any channels?

14 A. Yes.

15 Q. What about the group chats?

16 A. Yes.

17 Q. Now, with regard to these group chats and channels, are  
18 there limitations or parameters that anyone can set for these  
19 channels or group chats?

20 A. Yes. The owner of these group chats or channels can  
21 control the level of interaction that can be had and channels  
22 that you can perhaps comment on a post, but there's as I said  
23 not that back and forth.

24 In group chats you can change whether members of the group  
25 chat are allowed to send pictures. Some restrict you to only

## Cross Examination of C. Jackson

1 one.

2 **BY MR. GOLDSTEIN:**

3 **Q.** What did they ask of you?

4 **A.** They asked if I would want to work as a confidential human  
5 source.

6 **Q.** Okay. Did they explain to you the nature of what you  
7 would be doing?

8 **A.** Yes.

9 **Q.** Okay. And obviously you agreed to do it, correct?

10 **A.** Correct.

11 **Q.** Okay. At the time, were you told that you were going to  
12 be paid for your services?

13 **A.** I understood there might be compensation. However, it was  
14 made clear that it would be irregular and there was no formal  
15 agreement for payment.

16 **Q.** Okay. So you testified on direct examination that you  
17 were paid approximately \$70,000; is that correct?

18 **A.** I actually -- 30,000 of that was, as I described,  
19 reimbursements. In terms of what I actually, for lack of a  
20 better term, put in the bank, it would be around \$40,000.

21 **Q.** Okay. So you spent \$30,000 out of your pocket working on  
22 this case?

23 **A.** Not just on this case, sir. That was over the course of  
24 four years.

25 **Q.** Okay. So those numbers don't just apply to this

1 investigation? You were doing other work?

2 A. Correct.

3 Q. Gotcha. Okay. Thank you. All right.

4 So you said on direct examination that when you went into  
5 these chatrooms and you were looking for domestic terrorism,  
6 sometimes it was directed by the FBI and sometimes it was  
7 organic, correct?

8 A. Yes.

9 Q. So when you came across Homunculus or Raccoon, who -- was  
10 that an organic --

11 A. Yes.

12 Q. -- situation?

13 A. Yes. I was not directed to locate or find or interact  
14 with the user Homunculus at that time.

15 Q. Okay. Or any other specific username or name of a person?

16 A. Correct. Nobody that I would identify with the user  
17 Homunculus.

18 Q. Okay. So you come across this, basically looking through  
19 these chatrooms that we've talked about?

20 A. Correct.

21 Q. And you were tasked with going online specifically to look  
22 for illegal activity and specifically violent activity,  
23 correct?

24 A. As I understand it, yes.

25 Q. And when you went into this chatroom, and you started

## Defense Closing Argument

1 beliefs, but he speaks about them openly with other like-minded  
2 individuals. You'll recall Dr. Perliger was the first  
3 individual to testify in this case. He testified about this  
4 issue, and what did he tell you? Not everyone who holds  
5 accelerationist's views acts on them. That is the government's  
6 own witness.

7 The person who wanted to act was Sarah Clendaniel because  
8 she thought she was dying and she thought that this would be  
9 one, great heroic act for her to undertake, something to be  
10 remembered by. As crazy as that sounds, that was her  
11 motivation.

12 And I told you that you would see lots of chat messages  
13 where both Brandon and Sarah and others were espousing these  
14 Neo-Nazi views to one another on line. I told you that these  
15 beliefs were repulsive to most and it would make you angry, but  
16 I asked you to set your personal feelings aside. I told you  
17 that the evidence would show that this conspiracy consisted of  
18 two individuals, Sarah Clendaniel and a person working for the  
19 government who we now know as Mr. Jackson, an individual the  
20 government paid tens of thousands of dollars for working for  
21 the FBI in an effort to trap Brandon Russell to make him a part  
22 of this conspiracy.

23 Sarah Clendaniel and Mr. Jackson planned to target and  
24 destroy five power substations throughout the Greater Baltimore  
25 area. That is the conspiracy that we're here about. Not